

REMARKS

The Examiner is thanked for the thorough review and consideration of the present application. The final Office Action dated July 11, 2003 has been received and its contents carefully reviewed.

By this Response, the Specification has been amended to correct a minor typographical error, and claims 1 and 11 have been amended. Support for the claim amendments may be found in the originally filed specification, for example, at page 10, lines 10-11, and page 11, lines 1-6. No new matter has been added. Claims 1-21 are pending in the application. Reconsideration and withdrawal of the rejections based upon the above amendments and the following remarks are requested.

In the Office Action, claims 1, 2, 4, 5, 9, 10, 11, 13-15, 17, 20 and 21 are rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent Application Publication 2002/0067455 A1 (“Komatsu”). Applicant traverses the rejection because Komatsu fails to teach or suggest each of the features recited in the claims of the present application. In particular, Komatsu fails to teach or suggest an in-plane switching mode LCD device and method of manufacturing that include, among other features, “a transparent conductive film in a layer over the common electrode, the transparent conductive film electrically connected with the common electrode”, as recited in independent claim 1; and “forming a transparent conductive film in a layer over the common electrodes, the transparent conductive film electrically connected with the common electrodes”, as recited in independent claim 11.

Applicant respectfully submits the Office Action incorrectly equates the common electrode 109 of Komatsu to the transparent conductive film 39 of the present application. In Komatsu, “the common electrode 109 is connected to the common bus line 103 through a first hole 125 which is formed in the passivation layer 120 and the gate insulator 112” (see paragraph [0040]). Further, Applicant notes the transparent conductive film of the present application is a separate recited element from the common electrode. As such, Komatsu fails to teach or suggest “a transparent conductive film in a layer over the common electrode, the transparent conductive film electrically connected with the common electrode”, as recited in independent claims 1 and 11 of the present application. Since Komatsu fails to teach or suggest each of the features recited in claims 1 and 11, Komatsu does not anticipate the claims of the present application, and claim 1 and its rejected, dependent claims 2, 4-5, and 9-10, and claim 11 and its rejected dependent

claims 13-15, 17 and 20-21, are patentable over Kamatsu. Reconsideration and withdrawal of the rejection are requested.

The Office Action rejected claims 1-5, 9, 10, 11-15, 17, 20 and 21 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6, 208, 399, issued to Ohta et al. ("Ohta"). Applicant traverses the rejection because Ohta fails to teach or suggest each of the features recited in the claims of the present application. In particular, Ohta fails to teach or suggest "a transparent conductive film in a layer over the common electrode, the transparent conductive film in a layer over the common electrode, the transparent conductive film electrically connected with the common electrode", as recited in independent claims 1 and 11.

Ohta discloses a liquid crystal display device having a high picture quality image active matrix system liquid crystal display device having thin film transistor elements. However, Applicant notes that in Ohta the counter electrode CT and the transparent conductive layer 1 are the same element. Further, the counter electrode CT is connected to the counter line CL by way of the through hole TH2 (see col. 9, lines 50-59). As such Ohta fails to teach or suggest each of the features recited in independent claims 1 and 11 of the present application, and claim 1 and its rejected dependent claims 2-5 and 9-10, and claim 11 and its rejected dependent claims 12-15, 17, 20 and 21 are patentable over Ohta. Reconsideration and withdrawal of the rejection are requested.

The Office Action rejected claim 6 under 35 U.S.C. § 102(e) as anticipated by or, in alternative, under 35 U.S.C. § 103(a) as obvious over either Komatsu and Ohta. The Office Action rejected claims 7, 8, 18 and 19 as being unpatentable over either Komatsu and Ohta in view of Applicant's Related Art ("Related Art"). The Office rejected claim 16 under 35 U.S.C. § 103(a) as being unpatentable over either Komatsu and Ohta in view of U.S. Patent No. 6,124,851, issued to Jacobson. Applicant traverses the rejections of these dependent claims because neither the Related Art, Komatsu, Ohta nor Jacobson teach or suggest the combined features recited in independent claims 1 and 11, from which the rejected claims 6, 7, 8, 16, 18 and 19 depend.

Applicant discussed above the deficient teachings of Komatsu and Ohta.

Jacobson discloses an electronic book with multiple electronically addressable page displays. However, Jacobson, when combined with any combination with the Related Art, Komatsu and Ohta, fails to teach or suggest an in-plane switching mode LCD device and method

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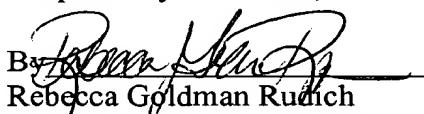
of manufacture that include "a transparent conductive film in a layer over the common electrode, the transparent conductive film electrically connected with the common electrode" as recited in independent claims 1 and 11 of the present application. Thus, claim 1 and its rejected dependent claims 6-8, and claim 11 and its rejected dependent claims 16, 18, and 19 are patentable over any combination of the Related Art, Komatsu, Ohta and Jacobson. Reconsideration and withdrawal of the rejections are requested.

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. According, the Examiner is respectfully requested to pass this application to issue. If the Examiner deems that a telephone conversation would further the prosecution of this application, the Examiner is invited to call the undersigned at (202) 496-7500.

If these papers are not considered timely filed by the Patent and Trademark Office, then a petition is hereby made under 37 C.F.R. §1.136, and any additional fees required under 37 C.F.R. §1.136 for any necessary extension of time, or any other fees required to complete the filing of this response, may be charged to Deposit Account No. 50-0911. Please credit any overpayment to deposit Account No. 50-0911. A duplicate copy of this sheet is enclosed

Dated: September 11, 2003

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